

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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**AKIL CARTER, et al.  
PLAINTIFFS,**

v.

**Case No. 19CV1422-JPS**

**CITY OF WAUWATOSA, et al.;  
DEFENDANTS.**

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**MOTION TO SEAL TRANSCRIPT OF CARL ANDERSON'S  
DEPOSITION**

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NOW COMES the Plaintiffs, by their attorney, Joy Bertrand, to ask the Court to seal the transcript of Carl Anderson's deposition. As further grounds therefore, the Plaintiffs submit the following:

At his deposition, Mr. Anderson expressed safety concerns, based on comments from the public on media reports about this case. The Parties agreed to ask this Court to seal his deposition transcript, to ensure that he could speak freely at his deposition, without fear of reprisal from members of the public.

The Plaintiffs listed his deposition transcript in their response to the Defendants' proposed finding of fact at ECF Doc. 58-2. The actual transcript will be lodged as a proposed sealed document with this Motion.

The Court will find attached a proposed Order.

Respectfully submitted this 19th day of September, 2021.

s/Joy Bertrand  
Joy Bertrand

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